

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ERIC GERSBACHER,

Plaintiff,

**NOTICE OF MOTIONS *IN*  
*LIMINE***

-against-

14 Civ. 7600 (GHW) (KNF)

THE CITY OF NEW YORK, a municipal entity, NEW YORK  
CITY POLICE OFFICER GONZALEZ, NEW YORK CITY  
POLICE OFFICER RAMIREZ, NEW YORK CITY DEPUTY  
INSPECTOR EDWARD WINSKI, NEW YORK CITY "John  
Doe" POLICE OFFICERS 1-10,

Defendants.

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**PLEASE TAKE NOTICE** that upon the annexed Declaration of Brachah Goykadosh dated November 20, 2017 and the annexed exhibits thereto, the Memorandum of Law dated November 20, 2017, and upon all the papers and proceedings had herein, defendant Inspector Edward Winski will move this Court before the Honorable Gregory H. Woods, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007, in advance of trial for an Order pursuant to the Federal Rules of Evidence to exclude certain evidence at trial, and for further rulings regarding the admissibility of certain evidence, and relief as this Court may deem just, proper, and equitable.

**PLEASE TAKE FURTHER NOTICE** that in accordance with the Court's Individual Rules of Practice in Civil Cases, plaintiff's opposition must be served on defendants on or before November 27, 2017, and defendant's reply, if any, must be served on or before December 1, 2017.

Dated: New York, New York  
November 20, 2017

**ZACHARY W. CARTER**  
CORPORATION COUNSEL OF THE CITY OF NEW YORK  
*Attorney for Defendant Inspector Winski*  
100 Church Street  
New York, New York 10007  
(212) 356-3523

By:



Brachah Goykadosh  
*Assistant Corporation Counsel*  
Special Federal Litigation Division

cc: All counsel of record (by ECF only)

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Plaintiff,

-against-

THE CITY OF NEW YORK, a municipal entity, NEW  
YORK CITY POLICE OFFICER GONZALEZ, NEW  
YORK CITY POLICE OFFICER RAMIREZ, NEW  
YORK CITY DEPUTY INSPECTOR EDWARD  
WINSKI, NEW YORK CITY "John Doe" POLICE  
OFFICERS 1-10,

Defendants.

**NOTICE OF MOTIONS *IN LIMINE***

**ZACHARY W. CARTER**

Corporation Counsel of the City of New York

*Attorney for Defendants*

100 Church Street

New York, New York 10007

Of Counsel: Brachah Goykadosh

Tel: (212) 356-3523

*Due and timely service is hereby admitted.*

*New York, New York* ....., 2017 . . .

..... *Esq.*

*Attorney for* .....